

Intermountain Marketing Associates, LLC

Order of Sanctions

Date of Order: 12/18/2006

Respondents: Intermountain Marketing Associates, LLC of Draper, Utah, Thomas C. Howell of Osprey, Florida

Allegations: Securities Fraud, Unregistered Broker-Dealer or Agent, Filing a False or Misleading Statement with the Office of the Securities Commissioner

A Notice of Intent to Invoke Administrative Sanctions was filed on November 15, 2004, alleging securities fraud arising from a promissory note program offered by the respondents. Staff alleged the respondents omitted to disclose to investors that they had offered rescission other investors in a previous promissory note case with the Commissioner and that they were under investigation by the Commissioner's office.

The respondents were also not registered with the Commissioner to offer and sell the product and filed false or misleading information with the Commissioner regarding offering rescission to all Kansas investors when they had not disclosed the five Kansas investors that were the subject of this Order.

The Respondents failed to timely request a hearing and was ordered by the Commissioner to Cease and Desist offering and selling securities in Kansas, barred from associating with any broker-dealer or investment adviser in the state, and fined \$10,000. They were further ordered to pay \$418,841.78 in restitution to five Kansas investors.

Notice to Investors: If you are not a resident of Kansas and have been affected by actions that are similar to those described in this synopsis, you should consider contacting your state securities regulator for assistance. To locate your securities regulator, go to the [North American Securities Administrators Association](#) website. If you choose to contact your state securities regulator, please inform him or her of the action taken by the State of Kansas.